

Customer No. 24498  
Attorney Docket No.: PA040025  
Office Action Dated: 07/09/2010

### Remarks and Arguments

Claims 1 – 6 and 8 – 13 are pending in the application. Claims 1 and 8 are independent.

In the present response, several claims are amended to more clearly and distinctly claim the subject matter that Applicants regard as their invention. No new matter is believed to be added by the present amendment.

#### Rejection of claims 1 – 3, 5, 6, 8 – 10, 12 and 13 under 35 U.S.C. §103(a) over Garney (US Patent 5,412,798) in view of Yamauchi et al. (US Patent 5,661,823, hereinafter referred to as "Yamauchi")

Applicants submit that for at least the following reasons, claims 1 – 3, 5, 6, 8 – 10, 12 and 13 are patentable over the combination of Garney and Yamauchi.

For example, claim 1, in part, recites:

"detecting connection or disconnection of the removable media device;

updating the current status in case a connection or disconnection is detected;

checking a type of user input upon occurrence of user input, wherein the user input is not generated by the connection or disconnection of the removable media device;

keeping the current status of the removable media device if the type of user input is not related to the removable media device;

checking whether a characteristic feature of the at least one removable medium has changed, if the type of user input is related to the removable media device;

keeping the current status if the characteristic feature of the removable medium has not changed; and

updating the current status if the characteristic feature of the removable medium has changed." (Emphasis added).

Therefore, the claimed invention as recited in claim 1 requires, detecting connection or disconnection of the removable media device and updating the current status if a connection or disconnection is detected, in addition to checking a type of user input upon occurrence of user input, wherein the user input is not generated by connection or disconnection of the removable media device.

Applicants submit that Garney only detects a hardware event and modifies the status of the feature cards in case of a hardware event "card insertion/removal."

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However, there is no further checking of a type of user input, where the user input is not generated by the connection or disconnection of the removable media device. In the Office Action, page 4, the Office acknowledges that Garney does not teach the user input as described in claim 1. Consequently, Garney does not teach or suggest *keeping the current status of the removable media device if the type of user input is not related to the removable media device; checking whether a characteristic feature of the at least one removable medium has changed, if the type of user input is related to the removable media device; keeping the current status if the characteristic feature of the removable medium has not changed; and updating the current status if the characteristic feature of the removable medium has changed.* Therefore, Garney fails to disclose the above claimed features.

In the Office Action, page 4, the Office points to Yamauchi for the teaching of the features missing in Garney. However, Applicants submit that Yamauchi fails to cure the deficiencies present in Garney.

Yamauchi's editing machine 600 is designed to receive operations of the exclusive keyboard 602a and remote control operation part 602i, display the menu of functions on the display part 602h of the exclusive keyboard 602a, and select a desired function from this menu (column 50, lines 37 – 41). However, Yamauchi, column 50, lines 48 – 50, states: "when started (step S159), and the power switch 611 is manipulated in step S160 to turn on the power source," (emphasis added) which clearly does not relate to user input during operation of the device. Yamauchi does not give a hint or suggestion to check a user input that happens during operation of a device in view of whether it relates to a removable media unit or not. In contrast, Yamauchi, column 52, lines 3 – 8, just states that, upon user input "retrieval," all input sources are displayed. There is no hint that a checking of whether the input sources detected to be available in a previous step (e.g. after "power switch on") are still available, is done after user input "retrieval." The problem to be solved by the present invention is not apparent in Yamauchi, and thus there is no hint of having to check a user input that happens during operation of a device in view of whether it relates to a removable media unit or not. Therefore, Yamauchi does not cure the deficiencies present in Garney.

In the Office Action, page 4, the Office alleges that the motivation to combine the teaching of Garney with Yamauchi is that it "reduces possible functions on the

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basis of the result of judgment, and initializes necessary devices" (Column 50, lines 52 – 54). Applicants submit that in column 50, lines 49 – 54, Yamauchi states that the power switch 611 is manipulated in step S160 to turn on the power source, the CPU part 625 judges the type and quantity of devices connected to the editing machine 600 in step S161, and reduces possible functions on the basis of the result of judgment, and initializes necessary devices. Therefore, the reason provided by the Office is only related to the powering up of the machine, and not with the user input that happens during operation of a device in view of whether it relates to removable media unit or not. Thus, applicants respectfully submit that the reason to combine the references is not supported by the references nor by the general knowledge of one skilled in the art.

Applicants submit that in case of an external removable media device in which a removable medium can be inserted or removed there from, it is not sufficient to only detect "insertion/removal" of the removable media device, but also "insertion/removal" of the removable medium itself. This, however, is technically not possible with existing devices. Instead of using a common approach of "repeatedly checking status by polling the removable medium," Applicants have proposed in certain embodiments that it is more efficient to predict an upcoming access to the removable medium by checking a type of user input. If this type of user input is of a certain category, then the status of the removable medium device is checked. Further, Applicants submit that this is not done by simple polling (which would not indicate if another removable medium had replaced the first one) but by checking a characteristic feature of the removable medium. The above advantages of the invention are not realized by Garney or Yamauchi. Therefore, it is not obvious for a skilled person to combine and modify the teachings of Garney and Yamauchi to arrive at the claimed invention.

In view of at least the foregoing, Applicants submit that claim 1 is patentable over the combination of Garney and Yamauchi.

Independent claim 8 is different from and should be interpreted independently of claim 1. However, since claim 8 contains many similar features as discussed above for claim 1, Applicants essentially repeat the above arguments for claim 1 and apply them to claim 8, pointing out why claim 8 is patentable over the combination of Garney and Yamauchi. Dependent claims 2, 3, 5, 6, 9, 10, 12 and 13 respectively depend from and inherit all the features of either claim 1 or 8. Therefore, claims 2,

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3, 5, 6, 9, 10, 12 and 13 are patentable for at least the reason that they respectively depend from either claim 1 or 8, with each dependent claim containing further distinguishing features.

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Rejection of claims 4 and 11 under 35 U.S.C. §103(a) over Garney in view of Yamauchi and further in view of Edmondson (US Patent 3,619,585)

Applicants submit that Edmondson does not cure the deficiencies present in the combination of Garney and Yamauchi as discussed above. Dependent claims 4 and 11 respectively depend from and inherit all the features of either claim 1 or 8. Therefore, claims 4 and 11 are patentable for at least the reason that they respectively depend from either claim 1 or 8, with each dependent claim containing further distinguishing features.

Withdrawal of the rejection of claims 1 – 6 and 8 – 13 under 35 U.S.C. §103(a) is respectfully requested.

Conclusion

Having fully addressed the Examiner's rejections it is believed that, in view of the preceding amendments and remarks, this application stands in condition for allowance. Accordingly then, reconsideration and allowance are respectfully solicited.

It is believed that there are no additional fees due with regard to the filing of this response other than the one month extension of time. However if there is an additional fee due, please charge the fee, or credit any overpayment, to Deposit Account No. 07-0832.

Respectfully submitted,

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